



John P. Zager
General Manager

Union Oil Company of California
3800 Centerpoint Drive
Suite 100
Anchorage, AK 99503
Tel 907 263 7815
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Email jzager@chevron.com

March 2, 2012

SCANNED

RECEIVED

MAR 06 2012

DEC
Division of Water Quality
Nastowat

Director, Office of Compliance and Enforcement
Attention: Data Entry Staff
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue, OCE-133
Seattle, WA 98101

RETURN RECEIPT REQUESTED
CERTIFIED MAIL: 91 7011 2970 0001 9243 7751

Re: REVISED Discharge Monitoring Reports
NPDES Permit No. AKG-31-5000

To whom it may concern:

Union Oil Company of California (UOCC) operates the Dolly Varden Platform (AKG-31-5009), Grayling Platform (AKG-31-5016), King Salmon Platform (AKG-31-5008), Steelhead Platform (AKG-31-5019), and Trading Bay Production Facility (AKG-31-5002) in Cook Inlet, Alaska. In our efforts to assure compliance with the Cook Inlet NPDES General Permit AKG-31-5000 and applicable laws and regulations, UOCC identified Discharge Monitoring Reports (DMRs) that require revision. None of the changes result in any violations of permit conditions.

A list of revised DMRs is presented below in Table 1. Both the revised DMR and photocopies of the original DMR pages have been included. Consistent with the authorization in your e-mail from September 16, 2010, this letter certifies all of the 26 pages of DMRs attached to this letter.

If you have any questions, please direct them to Mr. Rodney Bailey at (432) 687-7123 or via e-mail at bailergq@chevron.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Director, Office of Compliance and Enforcement
US Environmental Protection Agency
March 2, 2012
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Sincerely,

A handwritten signature in black ink, appearing to read "John P. Zager", with a long horizontal flourish extending to the right.

John P. Zager

cc: ADEC / Certified Mail 91 7011 2970 0001 9243 7768

Table 1. DMR Revisions

February 2011

Facility	Parameter	Reason for Revision
Grayling Platform (AKG-31-5016)	Workover Fluids (017)	Estimated amount of workover fluids sent to Trading Bay Production Facility were not reported.
Trading Bay Production Facility (AKG-31-5002)	Produced Water and Sand (015)	Estimated workover fluid flow rate was not reported.

April 2011

Facility	Parameter	Reason for Revision
Grayling Platform (AKG-31-5016)	Workover Fluids (017)	Estimated amount of workover fluids sent to Trading Bay Production Facility was misreported.
Trading Bay Production Facility (AKG-31-5002)	Produced Water and Sand (015)	Estimated well treatment/workover fluid flow rate was misreported.

May 2011

Facility	Parameter	Reason for Revision
King Salmon Platform (AKG-31-5008)	Workover Fluids (017)	Estimated amount of workover fluids sent to Trading Bay Production Facility was misreported.
Trading Bay Production Facility (AKG-31-5002)	Produced Water and Sand (015)	Estimated workover fluid flow rate was misreported.

June 2011

Facility	Parameter	Reason for Revision
King Salmon Platform (AKG-31-5008)	Workover Fluids (017)	Estimated amount of workover fluids sent to Trading Bay Production Facility was misreported.
Steelhead Platform (AKG-31-5019)	Workover Fluids (017)	Estimated amount of workover fluids sent to Trading Bay Production Facility was misreported.
Trading Bay Production Facility (AKG-31-5002)	Produced Water and Sand (015)	Estimated workover fluid flow rate was misreported.

December 2011

Facility	Parameter	Reason for Revision
Dolly Varden Platform (AKG-31-5009)	Non-Contact Cooling Water (009)	Waterflooding discharges for December 2011 should have been considered Non-Contact Cooling Water since the waterflood portion of the commingled waste stream was shut-in and there were no chemical additives. Volumes were corrected after original December 2011 DMR submittal.
Dolly Varden Platform (AKG-31-5009)	Waterflood (014)	Waterflooding discharges for December 2011 should have been considered Non-Contact Cooling Water since the waterflood portion of the commingled waste stream was shut-in and there were no chemical additives. Therefore there were no waterflood discharges in December 2011.

Director, Office of Compliance and Enforcement
US Environmental Protection Agency
March 2, 2012
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bcc: Susan Saupe, CIRCAC
Dolly Varden Lead Operators
Grayling Lead Operators
King Salmon Lead Operators
Steelhead Lead Operators
Trading Bay Production Facility Lead Operators
HES 2011 NPDES DMR Facility Files
HES 2011 NPDES DMR REGIONAL File

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

COP

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: UNION OIL COMPANY OF CALIFORNIA (UNOCAL)
ADDRESS: P.O. BOX 196247
ANCHORAGE, AK 99519-6247
FACILITY: TRADING BAY TREATMENT FACILITY
LOCATION: COOK INLET, Alaska
ATTN: JOHN ZAGER, GENERAL MANAGER

AKG315002	015-A
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD			
MM/DD/YYYY		MM/DD/YYYY	
04/01/2011	FROM	04/30/2011	TO

DMR Mailing ZIP CODE: 99519
MINOR
(SUBR 02)
PRODUCED WATER AND SAND
External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
pH	SAMPLE MEASUREMENT	*****	*****	*****	NA	*****	NA	NA	NA	NA	NA
00400 V 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	6 MINIMUM	*****	9 MAXIMUM	SU		Monthly	GRAB
pH	SAMPLE MEASUREMENT	*****	*****	*****	6.9	*****	7.4	SU	0	Weekly	GRAB
00400 W 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	6 MINIMUM	*****	9 MAXIMUM	SU		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
03582 T 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	29 MO AVG	42 DAILY MX	mg/L		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	*****	*****	*****	*****	22	34	mg/L	0	Weekly	COMP24
03582 U 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	29 MO AVG	42 DAILY MX	mg/L		Weekly	COMP24
Flow, in conduit or thru treatment plant*	SAMPLE MEASUREMENT	3.143035	3.462102	Mgal/d	*****	*****	*****	*****	NA	Monthly	ESTIMA
50050 1 0 Effluent Gross	PERMIT REQUIREMENT	Req. Mon. MO AVG	Req. Mon. DAILY MX	Mgal/d	*****	*****	*****	*****		Monthly	ESTIMA
Produced water, free oil	SAMPLE MEASUREMENT	*****	NA	NA	*****	*****	*****	*****	NA	NA	NA
79834 1 0 Effluent Gross	PERMIT REQUIREMENT	*****	Req. Mon. MO TOTAL	occur/mo	*****	*****	*****	*****		Daily	VISUAL

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE	DATE
John Zager, General Manager Mid Continent/Alaska Business Unit TYPED OR PRINTED		(907) 276-7600 AREA Code NUMBER	05/19/2011 MM/DD/YYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

NO DISCHARGE OF PRODUCED SAND IS ALLOWED

T = GRAB SAMPLE

U = COMPOSIT SAMPLE

V = DISCHARGE < 1 MGD (PREVIOUS MONTHS AVG RATE)

W = DISCHARGE > 1 MGD (PREVIOUS MONTHS AVG RATE)

EPA Form 3320-1 (Rev.01/06) Previous editions may be used

* Flow rates include deck drainage from Dolly Varden, Grayling, King Salmon, Monopod, and Steelhead Platforms.
Estimated Well Treatment/ Workover fluid flow rate: 0.056049

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

REVISED
3/2/2012

Form Approved
OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: UNION OIL COMPANY OF CALIFORNIA (UNOCAL)
ADDRESS: P.O. BOX 196247
ANCHORAGE, AK 99519-6247
FACILITY: TRADING BAY TREATMENT FACILITY
LOCATION: COOK INLET, Alaska
ATTN: JOHN ZAGER, GENERAL MANAGER

AKG315002	015-A
PERMIT NUMBER	DISCHARGE NUMBER

DMR Mailing ZIP CODE: 99519
MINOR
(SUBR 02)
PRODUCED WATER AND SAND
External Outfall

MONITORING PERIOD			
MM/DD/YYYY		MM/DD/YYYY	
FROM	04/01/2011	TO	04/30/2011

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
pH	SAMPLE MEASUREMENT	*****	*****	*****	NA	*****	NA	NA	NA	NA	NA
00400 V 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	6 MINIMUM	*****	9 MAXIMUM	SU		Monthly	GRAB
pH	SAMPLE MEASUREMENT	*****	*****	*****	6.9	*****	7.4	SU	0	Weekly	GRAB
00400 W 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	6 MINIMUM	*****	9 MAXIMUM	SU		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
03582 T 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	29 MO AVG	42 DAILY MX	mg/L		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	*****	*****	*****	*****	22	34	mg/L	0	Weekly	COMP24
03582 U 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	29 MO AVG	42 DAILY MX	mg/L		Weekly	COMP24
Flow, in conduit or thru treatment plant*	SAMPLE MEASUREMENT	3.143035	3.462102	Mgal/d	*****	*****	*****	*****	NA	Monthly	ESTIMA
50050 1 0 Effluent Gross	PERMIT REQUIREMENT	Req. Mon. MO AVG	Req. Mon. DAILY MX	Mgal/d	*****	*****	*****	*****		Monthly	ESTIMA
Produced water, free oil	SAMPLE MEASUREMENT	*****	NA	NA	*****	*****	*****	*****	NA	NA	NA
79834 1 0 Effluent Gross	PERMIT REQUIREMENT	*****	Req. Mon. MO TOTAL	occur/mo	*****	*****	*****	*****		Daily	VISUAL

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I certify, under penalty of law that this discharge and all attachments were prepared under my direction or supervision according to a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE		DATE	
John Zager, General Manager Mid Continent/Alaska Business Unit		(907) 276-7600		05/19/2011	
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		AREA Code	NUMBER
				MM/DD/YYYY	

COMMENTS AND EXPLANATION OF ANY VIOLATIONS(Reference all attachments here)

NO DISCHARGE OF PRODUCED SAND IS ALLOWED
T = GRAB SAMPLE
U = COMPOSIT SAMPLE
V = DISCHARGE < 1 MGD (PREVIOUS MONTHS AVG RATE)
W = DISCHARGE > 1 MGD (PREVIOUS MONTHS AVG RATE)

* Flow rates include deck drainage from Dolly Varden, Grayling, King Salmon, Monopod, and Steelhead Platforms.
Estimated Well Treatment/ Workover fluid flow rate: 0.034514 mgd
3/2/2012 Revision: Estimated well treatment/workover fluid flow rate was misreported